

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA**

In re:	)	
	)	Bankruptcy Case No. 20-41378-BSK
<b>MICHAEL G. RAYMER and JOAN</b>	)	
<b>K. RAYMER,</b>	)	Chapter 12
	)	
Debtors and Debtors in Possession.	)	Hon. Bradley S. Kruse
	)	
	)	<b>SECOND MOTION FOR THE EXTENSION</b>
	)	<b>OF TIME</b>
SSN: XXX-XX-0905	)	
SSN: XXX-XX-9875	)	
_____	)	

Michael G. Raymer and Joan K. Raymer, debtors and debtors in possession in this Chapter 12 bankruptcy case (“Debtors”), ask this court to enter an order granting them until Monday, January 25, 2021 at 12:00 p.m. Central Time, to file their Chapter 12 plan of reorganization. In support of this motion, the Debtors make the following allegations.

1. The undersigned general reorganization counsel for the Debtors has had a week he wouldn’t wish on his ex-wife. Consequently, though the plan is almost complete, he has not been able to dot every “I” and cross every “T” in that document, and he needs the weekend to discuss certain terms and provisions of the plan with his clients. This would enable counsel to file a document that reflects the standards to which he holds himself.

2. No creditor or other party in interest will be prejudiced by the additional twelve business day hours the Debtors seek to complete the drafting and filing of their plan.

**WHEREFORE**, the Debtors ask this court to enter an order allowing them until noon on Monday, January 25, 2021, to file their Chapter 12 plan of reorganization. The Debtors ask for any additional or different relief this court deems appropriate.

/s/ Vincent R. Ledlow

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